PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298

December 18, 2018

Jimmie Cho, Senior Vice President Gas Operations and System Integrity Southern California Gas Company 555 West 5th Street, GT21C3 Los Angeles, CA 90013



GI-2018-08-SEM40-05

Subject: General Order (G.O.) 112-F Inspection of Southern California Gas Company's and San Diego Gas & Electric Company's Public Awareness Program

Dear Mr. Cho:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a G.O. 112-F Inspection of Southern California Gas Company's (SCG) and San Diego Gas & Electric Company's (SDG&E) Public Awareness Program (PAP) on August 20-22, 2018. SED's staff used Pipeline and Hazardous Material Safety Administration's (PHMSA) Inspection Assistant (IA) Public Awareness Program Effectiveness Form (Form 21) as a reference guide to conduct the inspection.

SED's staff had one concern which is described in the enclosed "Summary of Inspection Findings". SED has already reviewed the necessary corrective actions by Sempra and does not require a response. SED considers this inspection closed.

If you have any questions, please contact Michelle Wei, at (213) 620-2780 or by email: miw@cpuc.ca.gov.

Sincerely,

Kenneth Bruno

Program Manager

Kuneth A.B

Gas Safety and Reliability Branch

Safety and Enforcement Division

CC: Michelle Wei, SED/GSRB Troy Bauer, Sempra

Kan Wai Tong, SED/GSRB

Matthewson Epuna, SED/GSRB

Summary of Inspection Findings

Dates of Inspection: August 20-22, 2018

Operator: SOUTHERN CALIFORNIA GAS CO

Operator IDs: 18484 (primary) 18112

Inspection Systems: SCG and SDG&E's Public Awareness Program

Assets (Unit IDs): GI-2018-08-SCG-44 (88389 88388)

System Type: GT

Inspection Name: SCG and SDG&E's Public Awareness

Lead Inspector: Michelle Wei

Operator Representative: Nadia Hang

Unsatisfactory Results

No Preliminary Findings.

Concerns

Public Awareness and Damage Prevention: Public Awareness (PD.PA)

 $Question \ \mathsf{Text} \ \mathsf{Has} \ \mathsf{an} \ \mathsf{audit} \ \mathsf{or} \ \mathsf{review} \ \mathsf{of} \ \mathsf{the} \ \mathsf{operator's} \ \mathsf{program} \ \mathsf{implementation} \ \mathsf{been} \ \mathsf{performed} \ \mathsf{annually}$ since the program was developed?

References 192.616(c) (192.616(i), API RP 1162 Section 8.3)

Assets Covered GI-2018-08-SCG-44 (Sempra PAP)

Issue Summary SCG and SDG&E's Public Awareness department underwent many management changes from late 2016 to mid-2017. As a result, at the time of the inspection the 2016 annual internal report was not completed properly. SCG and SDG&E were able to submit a completed report after getting input from their past public awareness program managers and reconciling various drafts. SED reviewed this final draft, which was provided to us on August 30, 2018, and agrees that it meets the basic requirements of RP 1162. SCG and SDG&E did not miss any of the required effectiveness surveys or messaging. However, SED is concerned that this upheaval did not allow for timely implementation of program improvements. SED acknowledges that such a time of transition is an unusual circumstance but cautions SCG and SDG&E to take care that other situations like this do not prevent necessary program improvements from going forward.